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Attorney for Defendant
JOSE MANUEL ONTIVEROS VERDUGO

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,) Case No: 2:23-CR-0162-DAD
Plaintiff,)
vs.)
JORGE OMAR ARREDONDO-GARCIA, et) STIPULATION AND ORDER TO CONTINUE
al.,) STATUS CONFERENCE AND EXCLUDE
Defendant.) TIME
) District Judge Dale A. Drozd
) New Date: June 11, 2024
) Time: 9:30 a.m.
)

IT IS HEREBY STIPULATED and requested by and between the parties through their respective counsel, ADRIAN KINSELLA, Assistant United States Attorney, attorney for the GOVERNMENT; PATRICK McCARTHY, attorney for Defendant JORGE OMAR ARRENDONDO-GARCIA; DINA SANTOS, attorney for Defendant GREGORIO ONTIVEROS VERDUGO; RACHELLE BARBOUR, attorney for Defendant JOSE MANUEL ONTIVEROS VERDUGO; MARK REICHEL, attorney for Defendant ALBERTO NAVARRO ZAPATA; and MICHAEL LONG, attorney for Defendant WILFREDO F. REYES, that the status conference currently set for Tuesday, March 26, 2024, be continued to Tuesday, June 11, 2024 at 9:30 a.m., and that time be excluded for preparation of counsel.

There is a protective order in this multi-defendant case. (Doc. 69.) The Government first produced discovery consisting of approximately 700 pages of Bates-stamped documents and over 73.9 gigabytes of native files, including cell phone databases and other items for defense

1 review. The Government then produced over 1400 pages of additional protected discovery. A
2 third production of approximately 2000 pages of protected discovery was just received last week.
3

4 Since the start of the case, Defense counsel have been reviewing and analyzing the above,
5 conducting legal research, meeting with their clients, and otherwise preparing for trial. The
6 above tasks are ongoing, and the defense requires additional time to review discovery, discuss
7 the case with their clients and the Government, and continue to prepare. The parties believe that
8 failure to grant the requested continuance would deny defense counsel the reasonable time
9 necessary for effective preparation, taking into account the exercise of due diligence.

10 Accordingly, the parties stipulate and request that the Court exclude time between the
11 date of the filing of this stipulation through the new status conference date of June 11, 2024
12 under 18 U.S.C. § 3161(h)(7)(A), (B)(iv) (Local Code T4). The parties agree that the ends of
13 justice served by continuing the case as requested outweigh the interest of the public and the
14 defendant in a trial within the original date prescribed by the Speedy Trial Act.

15 Date: March 20, 2024

16 /s/ Patrick McCarthy
17 PATRICK McCARTHY
18 Attorney for Defendant
19 JORGE OMAR ARREDONDO-GARCIA

20 /s/ Dina Santos
21 DINASANTOS
22 Attorneys for Defendant
23 GREGORIO ONTIVEROS VERDUGO

24 HEATHER E. WILLIAMS
25 Federal Defender

26 /s/ Rachelle Barbour
27 RACHELLE BARBOUR
28 Attorney for Defendant
JOSE MANUEL ONTIVEROS VERDUGO

29 /s/ Mark Reichel
30 MARK REICHEL
31 Attorney for Defendant
32 ALBERTO NAVARRO ZAPATA

1 /s/ Michael Long
2 MICHAEL LONG
3 Attorney for Defendant
4 WILFREDO F. REYES

5 DATED: March 20, 2024

6 PHILLIP A. TALBERT
7 United States Attorney

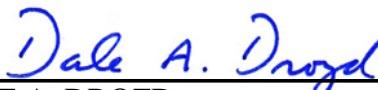
8 /s/ Adrian Kinsella
9 ADRIAN KINSELLA
10 Assistant U.S. Attorney
11 Attorney for the United States

12 O R D E R

13 Pursuant to the stipulation of the parties and good cause appearing, the status conference
14 currently set for Tuesday, March 26, 2024, is continued to Tuesday, June 11, 2024 at 9:30 a.m.,
15 and time is excluded under Local Code T4 for preparation of counsel.

16 IT IS SO ORDERED.

17 Dated: March 20, 2024

18 
19 DALE A. DROZD
20 UNITED STATES DISTRICT JUDGE